



Freebird Communications Inc.
16245 S. Lennox St.
Olathe, KS 66062
913-209-2788
www.freebirdtv.com

May 4, 2016

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: DA 16-367 / IB Docket No. 12-267 / Response to ATSI / Section 25.281

On behalf of my company, Freebird Communications Inc., and other companies within the Satellite News Gathering (SNG) industry, I respectfully request the Commission extend its blanket waiver of the identification requirement for digital video transmissions in Section 25.281(b).

Mandatory compliance with this regulation should be waived indefinitely, and the Commission should seek additional information to determine the extent this requirement would benefit the industry.

Currently, there is insufficient information and evidence to show this requirement would significantly reduce the incidence of satellite interference. Conversely, implementation of the rule on the current time table would have a devastating financial impact on the SNG industry. An industry primarily composed of small businesses.

If you take nothing else from my comments, please consider one fact: For properly-operated SNG-based transmissions, an ATIS/DVB-CID signal will only provide space station operators with information they already have. SNG operators already provide satellite companies their name, phone number, company and truck number when accessing and modulating a satellite carrier. When accessing satellite space, SNG engineers are in direct contact with the technical operations center of the space segment provider. This ensures the transmission is neither misaligned nor overpowered.

This CID requirement, and the associated financial cost of compliance, will only offer satellite space providers with help in tracking down rogue or unidentified satellite signals. And, only if that signal contains a DVB-CID signal, and it is present long enough for companies to identify and document the information.

To provide this CID signal, which would only help with an extremely limited number of occurrences, SNG operators will be forced to discard their current equipment, and buy new, compliant equipment at great expense.

Because the equipment we would be replacing would become obsolete, it could not be sold or traded in to help offset the cost of the new equipment. My SNG Company and many others will spend tens of thousands of dollars on equipment exclusively for compliance purposes. It has a zero percent return on investment for my company, and offers very little benefit to the industry.

Forced compliance with this regulation would, "impose unnecessary and disproportionately burdensome demands" on my small business, as stated in the Regulatory Flexibility Act of 1980.

In examining the merits of an extension or indefinite waiver of this CID requirement, the Commission should give serious consideration to the limited benefit this regulatory requirement would provide, the extremely burdensome cost it compels small businesses to endure, and the options the Regulatory Flexibility Act offers in providing relief to those small businesses affected.

Thank you for your time and consideration. My contact information is below, and I would be happy to answer any questions or concerns you may have about my comments.

I look forward to hearing your decision on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Roberts".

Matthew Roberts
President
Freebird Communications Inc.
16245 S. Lennox St.
Olathe, KS 66062
913-209-2788
matt@freebirdtv.com
www.freebirdtv.com